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RCRA PERMITTING & COMPLIANCE BRANCH
(RRCB)

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Mel Carnahan, Governor • David A. Shorr, Director

DIVISION OF ENVIRONMENTAL QUALITY

St. Louis Regional Office

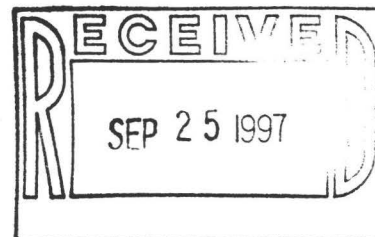
10805 Sunset Office Drive, Suite 100 St. Louis, MO 63127-1017

(314)822-0101

FAX (314)822-0943

September 3, 1997

Mr. Michael J. McClane, President
Cardinal Machine & Nipple Works, Inc.
1522 North Ninth St.
St. Louis, MO 63106



Dear Mr. McClane:

L.O.W. #97-SL.044

On August 19, 1997, a hazardous waste compliance inspection was conducted at Cardinal Machine & Nipple Works, Inc. by Mr. Joe Trunko of my staff. The inspection was conducted under the authority of the Resource Conservation and Recovery Act (RCRA) of 1976 and Sections 260.375(9) and 260.377 of the Missouri Hazardous Waste Management Law (1977) as amended.

Please review the attached Inspection Record and Checklist used by the inspector during the inspection. Circled citations on the checklist indicate items of noncompliance found during the inspection. The comments section of the checklist documents the observations of the inspector that resulted in the citation.

In order to insure that the facility returns to compliance, the following actions are required:

1. The 20-gallon drum used to accumulate waste solvent from the parts cleaner must be marked in accordance with 40 CFR 262.32 during the entire onsite storage/accumulation period. In addition, the drum must be marked with the date that waste is first placed in the drum. An example of the information that must be marked on the drum has been attached.
2. The emergency coordinator's name and telephone number, the telephone number of the fire department, and the location of fire extinguishers and spill control/emergency equipment must be posted next to the phone nearest the hazardous waste storage area. A map can be utilized to designate the locations of the fire extinguishers and emergency equipment.

3. Department records show Cardinal Machine & Nipple Works, Inc. to be a large quantity generator of hazardous waste. The findings of the inspection indicated that the facility is a conditionally exempt generator of hazardous waste. In addition, ownership of the facility has changed. An updated notification must be submitted to the Hazardous Waste Program that designates the current type and volume of hazardous waste generated as well as the current owner of the facility. A "Notification of Regulated Waste Activity" form has been attached.

By October 3, 1997, a written response must be submitted to this office that describes the actions taken to correct the unsatisfactory items described above. Please direct the response to Mr. Joe Trunko. A copy of your response should also be sent to Ms. Kathy Flippin, Chief-Hazardous Waste Enforcement Unit, Hazardous Waste Program, P.O. Box 176, Jefferson City, MO 65102.

Guidance information concerning hazardous waste and used oil management has been enclosed for your review.

Should you have any questions, please call Mr. Joe Trunko at (314) 822-0101.

Sincerely,

ST. LOUIS REGIONAL OFFICE



Robert S.P. Eck
Regional Director

RSPE/JLT/as
get

Enclosures

c: HWP



MISSOURI DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE PROGRAM
SMALL QUANTITY GENERATOR
INSPECTION RECORD AND CHECKLIST

S

SQG-INSP.

ONLY FOR FACILITIES THAT GENERATE/ACCUMULATE < 1000 Kg (2,200 lbs. or approximately, 5 drums)

NAME <u>Cardinal Machine & Nipple Works, Inc.</u>		DATE <u>8-19-97</u>	EPA I.D. NUMBER <u>MO006266142</u>
ADDRESS <u>1518-22 N. Ninth Street</u>		RR NO. <u>N/A</u>	MO I.D. NUMBER <u>022018</u>
CITY <u>St. Louis</u>	NUMBER OF EMPLOYEES <u>13 shop / 3 office</u>	YEARS AT SITE <u>51</u>	TELEPHONE NUMBER <u>(314) 231-0429</u>
FACILITY REPRESENTATIVE(S), TITLE(S) <u>Michael J. McClane, President</u>			

DESCRIPTION OF THE FACILITY'S OPERATIONS AND PLANT

Cardinal Machine & Nipple Works, Inc. (Cardinal) is a manufacturer of pipe nipples. Steel pipe is received in 21 ft. long sections. It is then cut to length and threaded. Equipment utilized includes an automatic saw, 3 band saws, a roller cut saw, and 12 threading machines. A mineral spirits based cutting oil (Amcoat 1A-S) is used in the machines. Used oil collects in a pan beneath the machine and is recirculated/reused. After threading, the bearings & nipples are placed in a pot that spins. The oil is recovered and reused in the machines. Scrap bearings are collected and sent to Grossman iron. Nipples are occasionally cleaned in a 30 gallon parts cleaner. Safety-Kleen Premium Solvent ^(150° flash point) is utilized. Dirty solvent is placed in a 20 gallon accumulation drum located next to the parts cleaner. Safety-Kleen services the drum every 2-3 months. The waste solvent is shipped offsite under contract agreement.

WASTE STREAMS

	DESCRIBE EACH WASTE STREAM GENERATED INCLUDING THE PRODUCTION PROCESS	GENERATION RATE	EPA ID NUMBER	DISPOSITION
1.	<u>Waste solvent generated from servicing of parts cleaner.</u>	<u>~20 gallons / 2 months</u>	<u>DC01</u>	
2.				
3.				
4.				
5.				

CHECK ALL THAT APPLY (Specify if possible)

- | | | |
|---------------------------------------|---|---|
| <input type="checkbox"/> NPDES Permit | <input type="checkbox"/> Lead/Acid Batteries | <input type="checkbox"/> POTW _____ |
| <input type="checkbox"/> Septic Tank | <input type="checkbox"/> H.W. Burner/Blender/Marketer | <input type="checkbox"/> Solid Waste Landfill _____ |
| <input type="checkbox"/> Air Permit | <input type="checkbox"/> Precious Metal Reclamation | <input type="checkbox"/> Waste Water Pretreatment |

A. GENERAL

1. <input checked="" type="checkbox"/> Registered as a HW Generator - Section 260.380.1 (1) RSMo and 10 CSR 25-5.262 (2)(A)	GGR
2. <input checked="" type="checkbox"/> Facility determines if waste is hazardous - 10 CSR 25-5.262(1) incorporating 40 CFR 262.11	GGR
3. <input checked="" type="checkbox"/> Utilizes a licensed hazardous waste transporter - Section 260.380.1 (5) RSMo	GGR
4. <input checked="" type="checkbox"/> Utilizes authorized HW TSD or RR facility - Section 260.380.1(7) RSMo	GGR
5. <input checked="" type="checkbox"/> Facility does not operate as a TSD - Section 260.390(1) RSMo	GGR

COMMENTS

notification needs to be updated to show current ownership and waste generation

PART 1: WALK-THROUGH INSPECTION**B. PRETRANSPORT, CONTAINERIZATION & STORAGE**

1. <input checked="" type="checkbox"/> Storage does not exceed 180 days (270 days if transported > 200 miles) - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(e)	GSQ
2. <input checked="" type="checkbox"/> Containers in good condition - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(2) referencing 40 CFR 265.171	GPT
3. <input checked="" type="checkbox"/> Waste compatible with container - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(2) referencing 40 CFR 265.172	GPT
4. <input checked="" type="checkbox"/> Containers closed in storage - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(2) referencing 40 CFR 265.173(a)	GPT
5. <input checked="" type="checkbox"/> Containers storing incompatible waste separated or protected from each other by a dike, berm or wall - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(2) referencing 40 CFR 265.177(c)	GPT
6. <input checked="" type="checkbox"/> Containers of ignitable or reactive waste stored > 50 ft. from property line (or meet requirements) - 10 CSR 25-5.262 (2)(C)5. referencing 40 CFR 265.176 as amended by 10 CSR 25-7.265 (2)(I)3.	GOR
7. <input type="checkbox"/> Waste packaged/labeled/marked per DOT during entire on-site storage period - 10 CSR 25-5.262 (2)(C)1.	GOR
8. <input type="checkbox"/> Date of accumulation marked on containers - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 262.34(a)(2)	GPT
9. <input checked="" type="checkbox"/> Containers protected from contact with accumulated liquids - 10 CSR 25-5.262(2)(C)2.B.(II)	GOR
10. <input type="checkbox"/> Containers clearly marked "hazardous waste" - 10 CSR 25-5.262(I) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 262.34(a)(3)	GPT
11. <input checked="" type="checkbox"/> Facility inspected and maintained (weekly) - 10 CSR 25-5.262(2)(C)2.A.(II)	GPT
12. <input checked="" type="checkbox"/> Daily inspection of areas subject to spills, ie. waste handling areas - 10 CSR 25-5.262(2)(C)2.A.(II)	GOR
13. <input checked="" type="checkbox"/> Adequate aisle space is available - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.35	GPT
14. <input checked="" type="checkbox"/> Placards available for transporter - 10 CSR 25-5.262(1) incorporating 40 CFR 262.33	GPT
15. <input checked="" type="checkbox"/> "No Smoking" signs conspicuously placed by ignitable or reactive wastes - 10 CSR 25-5.262(2)(C)2.D.(II)	GOR
16. <input checked="" type="checkbox"/> Waste oil containers in good condition, labeled and closed - 10 CSR 25-11.010(3)(C)	GOR

COMMENTS

20 gallon drum used to accumulate dirty solvent from parts cleaner was not labeled or dated.

(see # 7)

C. SATELLITE ACCUMULATION

1. <input checked="" type="checkbox"/> Containers kept closed - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.173	GPT
2. <input type="checkbox"/> Containers in good condition - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.171	GPT
3. <input type="checkbox"/> Waste compatible with container - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.172	GPT
4. <input type="checkbox"/> Quantities accumulated not exceeding 55 gal. (1 quart of acutely-hazardous wastes) - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)	GPT
5. <input type="checkbox"/> Satellite containers go to storage within 3 days of filing - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)3.	GPT
6. <input type="checkbox"/> Container marked identifying contents & beginning date - 10 CSR 25-5.262(2)(C)3.	GOR

COMMENTS

7. <input checked="" type="checkbox"/> Stored in satellite areas less than 1 year - 10 CSR 25-5.262(2)(C)3.	GOR	COMMENTS
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D. PREPAREDNESS AND PREVENTION AND EMERGENCY PROCEDURES

1. <input checked="" type="checkbox"/> Facility operated and maintained to minimize the possibility of an emergency - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.31	GPT	COMMENTS
2. <input checked="" type="checkbox"/> Adequate and proper spill control, decontamination and safety equipment available (fire blankets, respirators, SCBA, absorbents, etc.) and properly tested and maintained - 10 CSR 25-5.262 (1) incorporating 40 CFR 262.34 (d)(4) referencing 40 CFR 265 Subpart C.	GPT	
3. <input checked="" type="checkbox"/> Adequate water supply and fire control equipment - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.32(d)	GPT	
4. <input checked="" type="checkbox"/> Communication and emergency equipment tested and maintained - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.33	GPT	
5. <input type="checkbox"/> Emergency coordinator's name and phone number posted near phone - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(ii)	GSQ	
6. <input type="checkbox"/> Telephone number of fire department posted near phone - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(ii)	GSQ	
7. <input type="checkbox"/> Location of fire extinguisher and spill control equipment posted near phone - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(ii)	GSQ	
8. <input checked="" type="checkbox"/> Employees familiar with waste handling and emergency procedures - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(iii)	GSQ	
9. <input checked="" type="checkbox"/> Device in the hazardous waste operation area capable of summoning emergency assistance - 10 CSR 25-5.262 (1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.34(a)	GPT	
10. <input checked="" type="checkbox"/> Telephone or two-way radio onsite and capable of summoning local fire or police dept. - 10 CSR 25-5.262 (1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.32(b)	GPT	

E. SQG TANKS

TANK DESIGNATION	CONTENTS	CAPACITY	CONTAINMENT	AGE
1.				
2.	No hazardous waste storage in tanks			
3.				

1. <input checked="" type="checkbox"/> Uncovered tanks have 2 ft. freeboard or containment system - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(b)(3)	GPT	COMMENTS
2. <input type="checkbox"/> Continuously fed tanks equipped with a feed cut-off system or a proper by-pass system - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(b)(4)	GPT	
3. <input type="checkbox"/> Waste and/or treatment method is compatible with tank - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(b)(2)	GPT	
4. <input type="checkbox"/> Incompatible wastes not placed in same tank - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(f)	GPT	
5. <input type="checkbox"/> Ignitable or reactive wastes rendered safe/protected from sources of ignition or reaction - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(e)(1)	GPT	
6. <input type="checkbox"/> Ignitable or reactive wastes in covered tanks treated/stored in accordance with NFPA's buffer zone requirements - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(e)(2)	GPT	
7. <input type="checkbox"/> Volatiles with vapor pressure > 78 mm Hg @ 25° C not placed in open tanks - 10 CSR 25-5.262(2)(C)2.D.(1)	GOR	
8. <input type="checkbox"/> Wastes and residues removed from tank and equipment, and handled properly upon closure - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(d)	GPT	
9. <input checked="" type="checkbox"/> Tanks are clearly labeled or marked "Hazardous Waste" - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 262.34(a)(3).	GPT	

10.	<input type="checkbox"/> Inspection of waste feed cut off, bypass system, monitoring data and freeboard each operating day - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(c)	GPT	COMMENTS
11.	<input type="checkbox"/> Weekly inspection of confinement structure, construction materials and general area for leaks, corrosion or discharges - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(c)5	GPT	
12.	<input checked="" type="checkbox"/> Waste oil tanks in good condition, labeled and closed - 10 CSR 25-11.010(3)(C)	GOR	

PART 2: RECORDS INSPECTION

F. MANIFESTS

1.	<input checked="" type="checkbox"/> Facility uses manifest system or wastes reclaimed under contractual agreement - 260.380.1(6) RSMo, and 10 CSR 25-5.262(2)(B)	GMR
2.	<input checked="" type="checkbox"/> Generator maintains a copy of the contractual agreement on-site - 10 CSR 25-5.262(1) incorporating 40 CFR 262.20(e)(2)	GMR
3.	<input type="checkbox"/> Records maintained for a 3-year period - 10 CSR 25-5.262(1) incorporating 40 CFR 262.40(a)	GRR
4.	<input type="checkbox"/> Generator's MO & EPA I.D. Numbers - 10 CSR 25-5.262(2)(B)	GOR
5.	<input type="checkbox"/> Manifest document, ID and consecutive shipment numbers - 10 CSR 25-5.262(2)(B)2.A	GOR
6.	<input type="checkbox"/> Generator's name, address and phone number - 10 CSR 25-5.262(2)(B)1.	GMR
7.	<input type="checkbox"/> All transporters' names, phone numbers, license plate #s, MO & EPA I.D.#'s - 10 CSR 25-5.262(2)(B)2.	GMR
8.	<input type="checkbox"/> Designated facility name, address, phone, MO & EPA I.D. #, - 10 CSR 25-5.262(2)(B)1.	GMR
9.	<input type="checkbox"/> DOT shipping name, Hazard Class and waste I.D. # (RQ - if required) - 10 CSR 25-5.262(2)(B)2.	GMR
10.	<input type="checkbox"/> Containers, quantity and specific gravity designated - 10 CSR 25-5.262(2)(B)2.	GMR
11.	<input type="checkbox"/> Manifest signed and dated - 10 CSR 25-5.262(2)(B)1.	GMR
12.	<input type="checkbox"/> Out of state manifests have all required MO information - 10 CSR 25-5.262(2)(B)4.A	GOR
13.	<input type="checkbox"/> Manifest continuation sheets are not used - 10 CSR 25-5.262(2)(B)1	GOR
14.	<input type="checkbox"/> Manifest returned within 35 days - or exception report submitted within 45 days - 10 CSR 25-5.262(2)(D)2.C	GRR
15.	<input checked="" type="checkbox"/> Summary Manifest Reports and manifest copies sent to DNR quarterly - 10 CSR 25-5.262(2)(D)1	GOR
16.	<input checked="" type="checkbox"/> Tests waste or uses knowledge of waste to determine if the waste is restricted from land disposal - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)	GLB
17.	<input checked="" type="checkbox"/> "Land-Ban" notification/certification sent with manifests or with 1st shipment under a tolling agreement & retained on-site for 5 years - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)	GLB
18.	<input checked="" type="checkbox"/> Notification/certification includes correct EPA Hazardous Waste number, corresponding treatment standards, manifest number, and waste analysis data - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)	GLB

COMMENTS

solvent is supplied/removed under a contractual agreement → manifest are not utilized.

G. PREPAREDNESS AND PREVENTION

1.	<input checked="" type="checkbox"/> Arrangements with local emergency agencies - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.37	GPT
2.	<input checked="" type="checkbox"/> Emergency coordinator(s) on premise or on call - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(i)	GSQ

COMMENTS

H. WASTE OIL

1.	<input checked="" type="checkbox"/> Waste oil is managed properly and not disposed of into the environment - 10 CSR 25-11.010(1)(D).	GOR
2.	<input type="checkbox"/> Listed hazardous waste mixed with waste oil is handled as a hazardous waste - 10 CSR 25-11.010(1)(C)2.	GOR
3.	<input type="checkbox"/> Registered as waste oil generator if gen./accum. 220 lb. - 10 CSR 25-11.010(2)(A)	GOR
4.	<input type="checkbox"/> Written waste oil contract maintained - 10 CSR 25-11.010(4)(C)	GOR
5.	<input checked="" type="checkbox"/> Uses a licensed transporter and receiving facility - 10 CSR 25-11.010(4)	GOR

COMMENTS

I. RESOURCE RECOVERY

COMMENTS

1. <input checked="" type="checkbox"/> RR certification for energy recovery or reclamation of waste oil or hazardous waste on-site - 10 CSR 25-9.020(3)(A)3.	GOR
2. <input checked="" type="checkbox"/> Still bottoms or RR residues disposed of properly - Section 260.380.1(5) RSMo.	GOR
3. <input type="checkbox"/> Facility is classified as U, R1, or R2 accurately - 10 CSR 25-9.020(3)(A).	GOR
4. <input type="checkbox"/> Facility meets the operating conditions of certification - 10 CSR 25-9.020(3).	GOR
5. <input type="checkbox"/> Facility has submitted a written request and received approval from the DNR for all changes in operation including closure - 10 CSR 25-9.020(3)(E)1 and 2.	GOR
6. <input type="checkbox"/> Facility report submitted to DNR quarterly - 10 CSR 25-9.020(3)(E)6. referencing 10 CSR 25-7.264(2)(E)3.	GOR
7. <input type="checkbox"/> Facility maintains a complete written operating record - 10 CSR 25-9.020(3)(E)5. referencing 40 CFR 264.73(b)(1) and (2) as modified by 10 CSR 25-7.264(2)(E)2.	GOR
8. <input checked="" type="checkbox"/> Facility has notified EPA and the state that it qualifies for a small quantity on-site burner exemption or has interim status or a permit if it burns hazardous waste on-site - 10 CSR 25-7.266(1) incorporating 40 CFR 266.108 and 40 CFR 266.103.	GOR

CHECKLIST KEY

Check the ☒ if in compliance.

Circle the ☐ if not in compliance and provide comment.

N/A = Not Applicable

A shaded item is a serious deviation from the requirements (Class I violation)

An unshaded item is a significant deviation from the requirements (Class II violation unless conditions warrant Class I)

COMMENTS: INCLUDE DISCUSSION OF FACILITY'S WASTE MINIMIZATION PLAN

INSPECTOR'S SIGNATURE

DATE

8-19-97